

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION

In re:) Case No. 13-30743
MELISSA CEDENO)
) Chapter 13
)
)
Debtor)

**MOTION FOR AUTHORITY TO SELL PROPERTY, MOTION TO OBTAIN CREDIT, AND MOTION
TO MODIFY PLAN**

Now come Debtor, by and through counsel, and moves the Court as follows:

1. The instant Chapter 13 case was filed on or about April 6, 2013;
2. The plan was confirmed on June 21, 2013;
3. The plan included a secured claim to Piedmont Aviation FCU in the approximate amount of \$10,600 and a payment of \$378.08 per month on Debtor's 2006 Toyota, Debtor now requests:
 - a. That authority be given to trade the 2006 Toyota on a newer model car as Debtor's current auto is requiring frequent and costly repairs;
 - b. That authority be granted to debtor to obtain credit in an amount not to exceed \$25,000, with a payment not to exceed \$400 per month;
 - c. That the plan payment be commensurately be reduced from \$1,357 per month currently to \$957 per month;
 - d. That Debtor pay the new car loan directly to the prospective lender.
4. That non-base attorney's fees be awarded for this Motion.

Respectfully submitted on this, the 15 day of December, 2014.



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UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION

IN RE:)	Case No. 13-30743
		Adversary No:
MELISSA CEDENO)	Chapter 13
)	
)	
)	
Debtors.)	
)	

NOTICE OF OPPORTUNITY FOR HEARING

NOTICE IS HEREBY GIVEN that Joseph M Bochicchio, Attorney for Melissa Cedeno has filed a Motion for Authority to Sell Property, Motion to Obtain Credit, and Motion to Modify Plan, a copy of which is enclosed herewith and incorporated by reference. Any party in interest desiring to be heard with regard to said motion may request a hearing. Any request for hearing or response shall clearly identify the specific motion to which the response is directed, and it shall comply fully with Local Bankruptcy Rule 9013-1. Any response must be in writing and must be filed with the United States Bankruptcy Court, 401 West Trade Street, Charlotte, North Carolina, 28202, on or before fifteen (15) days from the date of this notice, with a copy served on Joseph M Bochicchio, Attorney for Movant. If a request for hearing is filed, the Court will conduct a hearing on January 13, 2015, at 9:30 a.m. at the United States Bankruptcy Court 401 West Trade St Room 126 Charlotte, North Carolina. If no request for hearing is timely filed, the Court will rule on the motion on the basis of the record without a hearing and no further notice will be given.

This 15th day of December, 2015.

/s/ Joseph M Bochicchio
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